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October 11, 2011

Via Hand Delivery


The Chambers of the Honorable James M. Peck
One Bowling Green
Courtroom 601
New York, New York 10004

Re: *In re Lehman Brothers Holdings Inc., et al.* Case No. 08-13555 (JMP)

To the Chambers of the Honorable James M. Peck:

Please find enclosed a Letter from Giants Stadium LLC concerning the discovery dispute between the Debtors and Nomura International plc, Nomura Securities Co., Ltd., and Nomura Global Financial Products, Inc.

Sincerely,



Bruce E. Clark

(Enclosure)

cc: Weil, Gotshal & Manges LLP
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Attorneys for the Debtors

The Chambers of the Honorable James M.
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-2-

The U.S. Trustee
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October 10, 2011

By Hand

The Honorable James M. Peck,
United States Bankruptcy Judge,
United States Bankruptcy Court,
One Bowling Green,
New York, New York 10004.

Re: *In re Lehman Bros. Holdings Inc. et al.*, No. 08-13555
(Bankr. S.D.N.Y.)

Dear Judge Peck:

We represent Giants Stadium LLC (“GSLLC”) in the above-captioned matter. We write regarding a discovery dispute between Lehman Brothers Holdings Inc. (“LBHI”), Lehman Brothers Special Financing Inc. (“LBSF”), and other LBHI chapter 11 debtor-subidiaries (collectively, “Debtors”) and Nomura International plc, Nomura Securities Co., Ltd., and Nomura Global Financial Products, Inc. (collectively, “Nomura”). At issue in the dispute is whether Nomura may gain discovery of information held by Debtors that is relevant to how certain counterparties terminated and valued derivative positions with the Debtors.

GSLLC has filed claims against LBSF and LBHI based on derivative contracts between GSLLC and LBSF (which LBHI guaranteed), and the parties have not reached a consensual resolution of those claims. Even though aspects of the derivative contracts at issue in GSLLC’s claims are unique compared to other derivative contracts at issue in the bankruptcy, the discovery sought by Nomura may be relevant to GSLLC’s claims. GSLLC therefore expresses its agreement with Nomura’s position that the

The Honorable James M. Peck

-2-

Debtors may not withhold from discovery the relevant information from Debtors' derivatives counterparties.¹

Accordingly, GSLLC supports the relief requested by Nomura in its letter and its draft memorandum of law in support of its proposed motion to compel [D.I. 20306] and in the letters that other interested parties have sent to the Court on this issue,² and asks the Court to grant the relief sought by Nomura regarding discovery of the derivative counterparties' terminations and valuations.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce E. Clark". The signature is fluid and cursive, with the first name "Bruce" and last name "Clark" being the most legible parts.

Bruce E. Clark

¹ Some of this data is in Debtors' possession solely because the Court granted Debtors' motion requesting that parties with derivative claims provide such data to Debtors for the purpose of facilitating the resolution of claims in this case. *See* Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim, Approving the Form and Manner of Notice Thereof and Approving the Proof of Claim Form [D.I. 4271].

² *See, e.g.*, Letter on JPMorgan Chase Bank N.A. dated Oct. 4, 2011 [D.I. 20580]; Letter of Credit Suisse AG Cayman Brach and other entities, dated Oct. 5, 2011 [D.I. 20588].